

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.

vs.

C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.

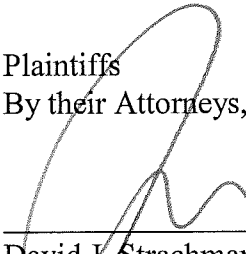
**PLAINTIFFS' OBJECTION TO DEFENDANTS' RENEWED MOTION FOR A STAY
AND MOTION FOR LEAVE TO SEEK A PROTECTIVE ORDER**

The Plaintiffs hereby object to Defendants' Renewed Motion for a Stay and Motion for Leave to Seek a Protective Order with respect to discovery propounded by the Plaintiffs.

This action has been pending for two years. Despite the fact that the Court denied Defendants' motion to dismiss on July 24, 2001, Defendants have stymied all efforts to move this case forward by conducting their motion practice in a piecemeal fashion (i.e. subsequently filing a request for certification, an additional motion to dismiss and leave to file a third).

Further, Defendants' provide no legitimate rationale for their request for a stay and leave to file a protective order. Notwithstanding Defendants' methodology, this matter should proceed unfettered with discovery and on to trial. Plaintiffs' objection is supported by the attached memorandum.

Plaintiffs
By their Attorneys,



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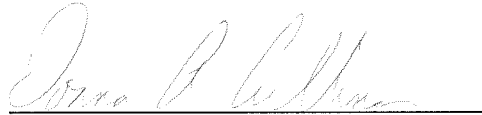
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CERTIFICATION

I hereby certify that on the 20 day of February, 2002, I mailed a true copy of the within objection and attached memorandum to:

Ramsey Clark, Esquire
Lawrence W. Schilling, Esquire
36 East 12th Street
New York, NY 10003

Deming E. Sherman
Edwards & Angell, LLP
2800 Bank Boston Plaza
Providence, RI 02903

A handwritten signature in cursive script, appearing to read "Deming E. Sherman", is written over a horizontal line.